

JAN 18 2013

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7006 2760 0000 8651 8705

Ms. Lawrence C. Rosen  
Environmental Operations, Incorporated  
1530 South Second Street, Suite 200  
St. Louis, Missouri 63104-4500

Dear Mr. Rosen:

RE: Annual Groundwater Monitoring Report Dated November 30, 2012 for the Solutia –  
J.F. Queeny Facility, St. Louis, Missouri  
EPA ID No. MOD 004 954 111

The U.S. Environmental Protection Agency Region 7 and the Missouri Department of Natural Resources (MDNR) have reviewed the subject document and are providing the following comments to be addressed in a revised submittal within 60 days of receipt of this letter.

1. Section 1.1 – Purpose: The last sentence of this paragraph should be deleted. This report should be revised to include a detailed account of the interim measures performed at the site. This would include but not be limited to dates of groundwater injections, quantity/volume of material injected, location of injection points, and depth horizon of injections into the groundwater. This information is necessary for the agencies to evaluate the effectiveness of the interim measures and to better support your conclusions on the effectiveness of the injections. The accounts of injection activity provided to the agencies in previous monthly progress reports are summaries of injection activity that do not provide the aforementioned details. Figures should be provided that depict the location of injection points and monitoring wells.
2. Section 7 – Conclusions and Recommendations: Monitoring Well LPZ-2 should be sampled semi-annually instead of annually due to the significant variation in VOC concentrations in the recent sampling events.

Please revise and resubmit the subject report within 60 days from receipt of this letter. If you have any questions, please call me at (913) 551-7755, or Christine Kump-Mitchell at (314) 416-2960.

Sincerely,

RCRA



Bruce Morrison  
Project Manager  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR

AWMD/WRAP/KNRP/BM:bft:01/18/13:H:AWMD/WRAP/Cores13/BM:commentltr.2012AnnualGroundwater  
monitoringreport.12.12.doc

KNRP	KNRP
Morrison	Johnson
01/18/13	01/18/13



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

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Mr. Lawrence C. Rosen  
Environmental Operations, Inc.  
1530 South Second Street, Suite 200  
St. Louis, Missouri 63104-4500

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Mr. Lawrence C. Rosen  
Environmental Operations, Inc.  
1530 South Second Street, Suite 200  
St. Louis, Missouri 63104-4500

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AWMD/WRAP-KNRP

UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY

Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

AWMD  
WRAP  
KNRP

*B. Morrison*